



November 4, 2009

Reply to the Attn: Office of Chief Counsel

MEMORANDUM FOR RECORD

FROM: Chief Counsel

SUBJECT: Blanket approval to Attend a Pre-Launch Reception Sponsored
by Computer Sciences Corporation

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

NASA invitees, accompanied by their spouses or guests, may attend a pre-launch reception sponsored by Computer Sciences Corporation (CSC), at the Doubletree Hotel, Cocoa Beach, Florida, on Sunday, November 15, 2009, from 6:00-8:00 p.m. This event is to be held in conjunction with the launch of STS-129 at the Kennedy Space Center.

This event will be a widely-attended gathering of approximately 150 representatives of government, the aerospace industry and the community. The reception will permit NASA employees to discuss and celebrate with other attendees their collaborative efforts in assuring the execution of continued safe space exploration. Refreshments, which will be provided by CSC, are valued at approximately \$10 per person.


I have determined that free attendance at the above mentioned reception is in the interest of the agency because it will further agency programs and operations. The attendance of NASA employees at the event will help to raise NASA's profile with national, state, and local business and governmental leaders, will contribute to community relations, and will support NASA's objectives. Given the purpose of the event, the broad attendance anticipated, and the modest market value of this social event, I have determined that the value to the agency in having employees attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, NASA employees that have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. NASA employees whose duties may substantially affect CSC are not covered in

this determination and should seek a determination pursuant to 5 CFR 2635.204(g)(3)(i) regarding their participation in these events from their local ethics counselor.

CSC is a lobbying organization, and as such NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge may attend only if they make arrangements with the sponsor to reimburse the cost of the refreshments they and any accompanying guests consume at the reception.

Questions regarding this determination may be addressed to the undersigned at 228-688-1587.



Amy E. Grose
Chief Counsel